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**Via ECF**

United States District Court for the  
Southern District of New York  
40 Foley Square,  
New York, New York 10007  
Attn: Hon. Valerie E. Caproni

**Re:    *Henri v. Thelus et al***  
      ***Case No. 1:24-cv-00329-VEC***

Dear Judge Caproni,

This firm has recently been engaged to act as counsel for Defendants Theriel Thelus and Senet D. Achill. Pursuant to this court's order, Defendant supplements paragraph 1 of the joint letter as follows:

**Description by Defendants:**

The parties in this case are all involved, in one way or another, with Haitian journalism. It is uncontested that, on January 31, 2023, Plaintiff was summoned to the Prosecutor's Office by way of a letter which indicated his broadcasts risked endangering public security and cited Plaintiff's violation of criminal law and the Haitian constitution. News publications throughout Haiti received copies of this letter and, accordingly, reported on it and Plaintiff's hosting of notoriously violent gang members on his show. Defendant Thelus, citing information provided by other news outlets, also reported on the letter and the allegations therein. Now, remarkably, Plaintiff is suing Defendants for their reporting. Plaintiff's lawsuit is frivolous as Defendants are protected by the fair report privilege, the fair index privilege, and the republication exception/wire service defense. Plaintiff's Complaint is further subject to dismissal because Plaintiff is a public figure and actual malice is not alleged and because the statements are true

Thank you.

Respectfully submitted,

*/s/ Daniel S. Szalkiewicz*  
By: Daniel S. Szalkiewicz, Esq.